



Your business  
is our business.

REDACTED – FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200  
Greenbelt, Maryland 20770  
phone: 301-459-7590, fax: 301-577-5575  
internet: [www.jsitel.com](http://www.jsitel.com), e-mail: [jsi@jsitel.com](mailto:jsi@jsitel.com)

June 23, 2015

**Via Hand Delivery**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: WC Docket No. 14-58  
2015 ETC Annual Report of Brazoria Telephone Company  
Study Area Code 442040**

Dear Ms. Dortch:

On behalf of Brazoria Telephone Company (“Brazoria”), JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission’s rules.<sup>1</sup> Brazoria seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.<sup>2</sup> The redacted version is also being filed this date via the FCC’s Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of its Progress Report on its Five-Year Service Quality Improvement Plan as required by Section 54.313(a)(1).<sup>3</sup>

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall  
JSI Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

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<sup>1</sup> 47 C.F.R. §§ 54.313, 54.422.

<sup>2</sup> *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Protective Order, DA 12-1857 rel. Nov. 16, 2012 (Protective Order). 47 C.F.R. § 54.313(f)(2).

<sup>3</sup> 47 C.F.R. §§ 0.457, 0.459, 54.313(a)(1).



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June 23, 2015

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: WC Docket No. 14-58  
2015 ETC Annual Report of Brazoria Telephone Company  
Study Area Code 442040  
Request for Confidentiality**

Dear Ms. Dortch:

John Staurulakis, Inc. (“JSI”), on behalf of its client Brazoria Telephone Company (the “Company”) hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission’s rules,<sup>1</sup> withholding from public inspection certain information contained in an attachment to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).<sup>2</sup>

1. The information for which the Company is seeking confidential treatment is an attachment to the Company’s annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission’s rules (“Report”).<sup>3</sup>
2. Rate-of-Return Eligible Telecommunications Carriers (“ETCs”) must file with the Commission an initial section 54.202(a) Five-Year Service Quality Improvement Plan (“Five-Year Plan”) which is contained in the attachment to the 2014 Report.<sup>4</sup>
3. The information contained in attachment for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company’s Five-Year Plan provided at FCC Form 481 Line 112 attachment. Information of this nature is confidential commercial information routinely withheld from public inspection.

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<sup>1</sup> 47 C.F.R. §§ 0.457, 0.459.

<sup>2</sup> 47 C.F.R. § 0.459(b)(1) through (9).

<sup>3</sup> 47 C.F.R. §§ 54.313, 54.422.

<sup>4</sup> See *In the Matter of Connect America Fund*, WC Docket No. 10-90, Order DA 14-591 (rel. May 1, 2014).

4. With respect to identifying the degree to which the subject attachment concerns a service that is subject to competition, the information is of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment contains competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

In its *March 5, 2013 Order*, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories."<sup>5</sup> Accordingly, because the Company is a rate-of-return carrier, it must file a five-year service improvement plan which contains proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

5. With respect to identifying possible exposure to competitive harm, the information contained in the Line 112 attachment is information that is not customarily released to the public. This information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.
6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachment, the Company is filing the attachment under seal. The Company uses the information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has

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<sup>5</sup> See *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Order, DA 13-332 (rel. Mar. 5, 2013) ("*March 5, 2013 Order*") at para 9 citing Section 54.202(a) (1) (ii).

been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.

7. Any previous versions of this information are not publicly available.
8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
9. Not applicable.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,

A handwritten signature in black ink, appearing to read "John Kuykendall". The signature is fluid and cursive, with the first name "John" and last name "Kuykendall" clearly distinguishable.

John Kuykendall  
JSI Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

**FCC Form 481 - Carrier Annual Reporting  
Data Collection Form**

REDACTED FOR PUBLIC INSPECTION

 FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	442040
<015>	Study Area Name	BRAZORIA TEL CO
<020>	Program Year	2016
<030>	Contact Name: Person USAC should contact with questions about this data	gilbert r rasco
<035>	Contact Telephone Number: Number of the person identified in data line <030>	9797982121 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	gil@btel.com

ANNUAL REPORTING FOR ALL CARRIERS		54.313 Completion Required	54.422 Completion Required
(check box when complete)			
<100>	Service Quality Improvement Reporting (complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<200>	Outage Reporting (voice) (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210>	<input checked="" type="checkbox"/> <-- check box if no outages to report	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<300>	Unfulfilled Service Requests (voice) 0	<input type="checkbox"/>	<input type="checkbox"/>
<310>	Detail on Attempts (voice) (attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<320>	Unfulfilled Service Requests (broadband) 0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<330>	Detail on Attempts (broadband) (attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<400>	Number of Complaints per 1,000 customers (voice)		
<410>	Fixed 0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420>	Mobile 0.0	<input type="checkbox"/>	<input type="checkbox"/>
<430>	Number of Complaints per 1,000 customers (broadband)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<440>	Fixed 0.0	<input type="checkbox"/>	<input type="checkbox"/>
<450>	Mobile 0.0	<input type="checkbox"/>	<input type="checkbox"/>
<500>	Service Quality Standards & Consumer Protection Rules Compliance (check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510>	442040tx510.pdf (attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600>	Functionality in Emergency Situations (check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610>	442040tx610.pdf (attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700>	Company Price Offerings (voice) (complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<710>	Company Price Offerings (broadband) (complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<800>	Operating Companies and Affiliates (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900>	Tribal Land Offerings (Y/N)? <input type="radio"/> <input checked="" type="radio"/> (if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1000>	Voice Services Rate Comparability Certification Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1010>	(attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<1100>	Certify whether terrestrial backhaul options exist (Yes or No) <input checked="" type="radio"/> <input type="radio"/> (if not, check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>
<1110>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>
<1200>	Terms and Condition for Lifeline Customers (complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet**

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>
<2005>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>

**Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet**

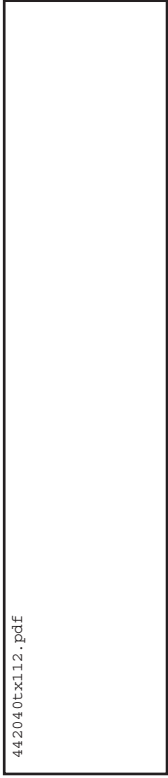
<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<b>(100) Service Quality Improvement Reporting Data Collection Form</b>		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	442040
<015>	Study Area Name	BRAZORIA TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	gilbert r rasco
<035>	Contact Telephone Number - Number of person identified in data line <030>	9797982121 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	gil@btel.com
<110>	Has your company received its ETC certification from the FCC? If your answer to Line <110> is yes, do you have an existing "5 year plan" filed with the FCC?	<div> <input type="radio"/> (yes / no )                 </div> <div> <input checked="" type="radio"/> (yes / no )                 </div>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.



Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113>	Maps detailing progress towards meeting plan targets	Yes
<114>	Report how much universal service (USF) support was received	Yes
<115>	How much (USF) was used to improve service quality and how support was used to improve service quality	Yes
<116>	How much (USF) was used to improve service coverage and how support was used to improve service coverage	Yes
<117>	How much (USF) was used to improve service capacity and how support was used to improve service capacity	Yes
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.	Not Applicable

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	442040
<015>	Study Area Name	BRAZORIA TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	gilbert r rasco
<035>	Contact Telephone Number - Number of person identified in data line <030>	9797982121 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	gil@btel.com

[illegible]

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

1/1/2015	
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	Residential Local Service Charge Effective Date	Single State-wide Residential Local Service Charge
<701>		
<702>		

[illegible]





OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

[illegible]

<b>(900) Tribal Lands Reporting Data Collection Form</b>		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	442040
<015>	Study Area Name	BRAZORIA TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	gilbert r rasco
<035>	Contact Telephone Number - Number of person identified in data line <030>	9797982121 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	gil@btel.com

<910>	Tribal Land(s) on which ETC Serves	
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<920>	Tribal Government Engagement Obligation	
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Name of Attached Document

If your company serves Tribal lands, please select (Yes,No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable

**(1100) No Terrestrial Backhaul Reporting  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	442040
<015>	Study Area Name	BRAZORIA TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	gilbert r rasco
<035>	Contact Telephone Number - Number of person identified in data line <030>	9797982121 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	gil@bte1.com

<1120> Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

<b>(1200) Terms and Condition for Lifeline Customers</b>		FCC Form 481
<b>Lifeline Data Collection Form</b>		OMB Control No. 3060-0986/OMB Control No. 3060-0819
		July 2013

<010>	Study Area Code	442040
<015>	Study Area Name	BRAZORIA TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	gilbert r rasco
<035>	Contact Telephone Number - Number of person identified in data line <030>	9797982121 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	gil@btel.com

Name of Attached Document

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

<1220>	Link to Public Website	HTTP
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"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

☒

<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,

☒

<1222> Details on the number of minutes provided as part of the plan,

☒

<1223> Additional charges for toll calls, and rates for each such plan.

<b>(2000) Price Cap Carrier Additional Documentation</b>		FCC Form 481
<b>Data Collection Form</b>		OMB Control No. 3060-0986/OMB Control No. 3060-0819
<i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>		July 2013

<010>	Study Area Code	442040
<015>	Study Area Name	BRAXORIA TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Gilbert F Rasco
<035>	Contact Telephone Number - Number of person identified in data line <030>	9797922121 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	gil@tel.com

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

- <2010> 2nd Year Certification {47 CFR § 54.313(b)(1)i}
- <2011a> 3rd Year Certification {47 CFR § 54.313(b)(1)ii}
- <2011b> Attachment {47 CFR § 54.313(b)(1)ii}

Name of Attached Document(s) Listing Required Information	

Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}

- <2012> 2013 Frozen Support Calculation {47 CFR § 54.313(c)(1)}
- <2013> 2014 Frozen Support Calculation {47 CFR § 54.313(c)(2)}
- <2014> 2015 Frozen Support Calculation {47 CFR § 54.313(c)(3)}
- <2015> 2016 and future Frozen Support Calculation {47 CFR § 54.313(c)(4)}


Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

Certification Support Used to Build Broadband

Connect America Phase II Reporting {47 CFR § 54.313(e)}

- <2017> 3rd year Broadband Service Certification
- <2018> 5th year Broadband Service Certification
- <2019> Interim Progress Certification


Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

<2021> Interim Progress Community Anchor Institutions

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Name of Attached Document(s) Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation	
Data Collection Form	
FCC Form 481	
OMB Control No. 3060-0986/OMB Control No. 3060-0819	
July 2013	

<010>	Study Area Code	442040
<015>	Study Area Name	BRAZORIA, TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Gilbert R Rasco
<035>	Contact Telephone Number - Number of person identified in data line <030>	9797982121 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	gilbert.r@tel.com

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010)	Progress Report on 5 Year Plan Milestone Certification (47 CFR § 54.313(f)(1)(ii))	<div>442040tx3010.pdf</div>	Name of Attached Document Listing Required Information
(3011)	Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	<div>442040tx3012.pdf</div>	<input checked="" type="checkbox"/>
(3012)	Community Anchor Institutions (47 CFR § 54.313(f)(1)(iii))	<div>442040tx3012.pdf</div>	<input checked="" type="checkbox"/>
(3013)	Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))	<div>442040tx3017.pdf</div>	<input checked="" type="checkbox"/>
(3014)	If yes, does your company file the RUS annual report	<div>442040tx3017.pdf</div>	<input checked="" type="checkbox"/>
Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:			
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)	<div>442040tx3017.pdf</div>	<input checked="" type="checkbox"/>
(3016)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<div>442040tx3017.pdf</div>	<input checked="" type="checkbox"/>
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	<div>442040tx3017.pdf</div>	<input checked="" type="checkbox"/>
(3018)	If the response is no on line 3014, Is your company audited?	<div>442040tx3017.pdf</div>	<input checked="" type="checkbox"/>
(3019)	If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications	<div>442040tx3017.pdf</div>	<input checked="" type="checkbox"/>
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<div>442040tx3017.pdf</div>	<input checked="" type="checkbox"/>
(3021)	Management letter and audit opinion issued by the independent certified public accountant that performed the company's financial audit	<div>442040tx3017.pdf</div>	<input checked="" type="checkbox"/>
(3022)	If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains: Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,	<div>442040tx3017.pdf</div>	<input checked="" type="checkbox"/>
(3023)	Underlying information subjected to a review by an independent certified public accountant	<div>442040tx3017.pdf</div>	<input checked="" type="checkbox"/>
(3024)	Underlying information subjected to an officer certification.	<div>442040tx3017.pdf</div>	<input checked="" type="checkbox"/>
(3025)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<div>442040tx3017.pdf</div>	<input checked="" type="checkbox"/>
(3026)	Attach the worksheet listing required information	<div>442040tx3017.pdf</div>	<input checked="" type="checkbox"/>

<010>	Study Area Code	442040
<015>	Study Area Name	BRAZORIA TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Gilbert F Rasco
<035>	Contact Telephone Number - Number of person identified in data line <030>	9797982121 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	gil@btel.com

Financial Data Summary	
(3027) Revenue	
(3028) Operating Expenses	
(3029) Net Income	
(3030) Telephone Plant In Service(TPIS)	
(3031) Total Assets	
(3032) Total Debt	
(3033) Total Equity	
(3034) Dividends	



<b>Certification - Reporting Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	442040
<015>	Study Area Name	BRAZORIA TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	gilbert r rasco
<035>	Contact Telephone Number - Number of person identified in data line <030>	9797982121 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	gil@btel.com

**TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:**

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

<b>Certification - Agent / Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	442040
<015> Study Area Name	BRAZORIA TEL CO
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	gilbert r rasco
<035> Contact Telephone Number - Number of person identified in data line <030>	9797982121 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	gil@btel.com

**TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:**

<b>Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier</b>	
I certify that (Name of Agent) <u>wes robinson</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	wes robinson
Name of Reporting Carrier:	BRAZORIA TEL CO
Signature of Authorized Officer:	CERTIFIED ONLINE Date: 06/22/2015
Printed name of Authorized Officer:	gilbert rasco
Title or position of Authorized Officer:	vp operations
Telephone number of Authorized Officer:	9797982121 ext.
Study Area Code of Reporting Carrier:	442040 Filing Due Date for this form: 07/01/2015
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**TO BE COMPLETED BY THE AUTHORIZED AGENT:**

<b>Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier</b>	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	BRAZORIA TEL CO
Name of Authorized Agent or Employee of Agent:	Wes Robinson
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE Date: 06/22/2015
Printed name of Authorized Agent or Employee of Agent:	Wes Robinson
Title or position of Authorized Agent or Employee of Agent	Manager - Regulatory Affairs
Telephone number of Authorized Agent or Employee of Agent:	5123380473 ext.
Study Area Code of Reporting Carrier:	442040 Filing Due Date for this form: 07/01/2015
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

## Attachments

**REDACTED – FOR PUBLIC INSPECTION**

**ATTACHMENT - LINE 112**

**Five-Year Network Improvement Plan and  
Progress Report**

**ATTACHMENT REDACTED IN ENTIRETY**

**Brazoria Telephone Company**

**Study Area Code: 442040**

**Response to Line 510 - Service Quality Standards and Consumer Protection Rules**

**Compliance – Voice and Broadband**

In establishing this certification in its *2005 ETC Order*,<sup>1</sup> the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”<sup>2</sup> The FCC found that for wireless ETCs, compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement and that the sufficiency of other commitments would be considered on a case-by-case basis.<sup>3</sup> In this context, the FCC stated, “to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement.”<sup>4</sup>

Brazoria Telephone Company (“Company”) hereby certifies that its voice service complies with applicable service quality standards and consumer protection rules under the Texas Administrative Code, Title 16, Part II, as established by the Public Utility Commission of Texas. These obligations include, but are not limited to, the following: (1) filing a Local Exchange Tariff which discloses rates, terms and conditions of service to customers pursuant to Subchapter J requirements in Sections 26.201-26.230; (2) adherence to state consumer protection requirements

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<sup>1</sup> *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) (“*2005 ETC Order*”).

<sup>2</sup> *Id.* at para. 28.

<sup>3</sup> *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: “(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy.” *Id.* at n. 71.

<sup>4</sup> *Id.* at n. 72.

governing telephone providers as identified in Subchapter B, in Sections 26.21-26.37; and (3) service quality standards requirements as identified in Subchapter C, Sections 26.51 -26.57. In addition, the Company complies with numerous federal consumer protection standards including, but not limited to: (1) Truth-in-Billing Rules outlined in 47 CFR § 64.2401; and (2) compliance with Federal CPNI rules, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

For its broadband service, Company hereby certifies that while there are no applicable state broadband service quality standards and consumer protection rules yet established under the Texas Administrative Code by the Public Utility Commission of Texas, the Company discloses rates, terms and conditions on its public web site and the Company complies with applicable federal and state customer protection standards generally applicable to all businesses operating in Texas. In addition, the Company adheres to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3. The Company furthermore will comply with all requirements set forth in the 2015 *Open Internet Order* when it becomes effective.

**Brazoria Telephone Company**

**Study Area Code: 442040**

**Response to Line 610 - Ability to Function in Emergency Situations  
for Voice and Broadband**

Brazoria Telephone Company (“Company”) hereby certifies that it is able to function in emergency situations as set forth in the Code of Federal Regulations, Title 47, Part 54, Subpart C, §54.202(a)(2)<sup>1</sup> and the Texas Administrative Code. The Company’s network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations also allows the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, the Company is able to function under emergency operations in accordance with Public Utility Commission of Texas Substantive Rules §26.51 *Reliability of Operations of Telecommunications Providers* and §26.52 *Emergency Operations* which include obligations for continuity of service and emergency operations planning and service provision capability for dominant carriers. Any central office not equipped with permanently installed standby generators contains as a minimum four hours of battery reserve without voltage falling below the level required for proper operation of all equipment. In addition, all central offices without installed

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<sup>1</sup> Section 54.202(a)(2) requires ETCs that are designated by the Commission to “demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.”

emergency power facilities have a mobile power unit available which can be delivered and connected on short notice.

The Company's standby generators and battery back-up equipment support both voice and broadband network equipment in the event of an emergency situation.



REDACTED FOR PUBLIC INSPECTION

(700) Price Offerings including Voice Rate Data  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	442040
<015>	Study Area Name	BRAZORIA TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	gilbert r rasco
<035>	Contact Telephone Number - Number of person identified in data line <030>	9797982121 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	gil@btel.com

	Residential Local Service Charge Effective Date	1/1/2015
<701>	Residential Local Service Charge	
<702>	Single State-wide Residential Local Service Charge	

<703>

[illegible]

<010>	Study Area Code	442040
<015>	Study Area Name	BRAZORIA TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	gilbert r rasco
<035>	Contact Telephone Number - Number of person identified in data line <030>	9797982121 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	gil@tel.com

[illegible]

REDACTED FOR PUBLIC INSPECTION

[illegible]

# **Brazoria Telephone Company**

**Study Area Code: 442040**

## **Rates, Terms and Conditions for Lifeline Service**

**(Response to Form 481, Line 1210)**

Local exchange service rates and charges as specified below are for one-party service throughout Brazoria Telephone Company's entire service area. Unless otherwise specified, the rates and charges specified below are payable for a period of one month, in advance, and entitle the customer to unlimited, flat rate calling within his home exchange as well as non-optional extended area service (EAS) with the Brazosport area, which can be dialed directly without incurring a toll charge.

Residential Local Exchange Access Line Rates:<sup>(1)(2)</sup>

<b>Exchange Name</b>	<b>R-1 Rate</b>	<b>Res. EAS Charge</b>	<b>Bundle w/Basic Local Svc.</b>
Brazoria	\$12.25	\$ 3.50	\$ 19.99
Churchill	\$15.75	\$ -	\$ 19.99

<sup>(1)</sup> Above listed fees do not include mandatory taxes, fees and surcharges, including, but not limited to Texas Universal Service Fund charges, 9-1-1 fees, and municipal franchise fees.

<sup>(2)</sup> Qualified Lifeline customers are eligible for Lifeline credits or discounts as outlined in the attached Lifeline tariff.

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LOCAL EXCHANGE SERVICE

6.4 LIFELINE PROGRAM

6.4.1 General

- A. Lifeline Service is a retail local service offering sponsored by the FCC and available to qualifying low-income consumers in accordance with the Public Utility Commission of Texas' Subst. R. 26.412 and the Low-Income Discount Procedural Guide.
- B. Consumers qualifying for Lifeline Service are offered the services or functionalities enumerated in Chapter 47 Code of Federal Regulations §54.101(a)(relating to Supported Services for Rural, Insular and High Cost Areas). T
- C. The Company shall offer Toll Denial at no charge to all qualifying low-income consumers at the time such consumers subscribe to Lifeline Service.
- D. A customer otherwise eligible to receive the Lifeline Service shall not be prohibited from obtaining and using telecommunication equipment and services designed to aid such customer in utilizing qualifying telecommunication services.

LOCAL EXCHANGE SERVICE

6.4 LIFELINE PROGRAM (Cont'd)

6.4.1 **General** (Continued)

- E. Lifeline Service rate reductions only apply to basic network service and do not apply to long distance service, 976 and other information provider services, or any other optional services or functionalities (i.e., custom calling features, construction, etc.) which may or may not be tariffed. Customers may subscribe to such services including bundled service, where available, at their discretion, although the Lifeline Service reduction only applies to the basic service charge portion of the bundled service.
- F. The Lifeline Service rate reductions do not apply to service connection charges.
- G. Lifeline Service will not be available on a retroactive basis unless directed by the Low Income Discount Administrator (LIDA) or by the Commission.
- H. The Company shall waive monthly number portability charges, subject to its tariff, for Lifeline customers.

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PUBLIC UTILITY COMMISSION OF TEXAS  
EFFECTIVE

APR 2 '12 CONTROL# DKT. NO. 402225

TARIFF CLERK

ISSUED BY: John H. Greenberg  
President

LOCAL EXCHANGE SERVICE

6.4 LIFELINE PROGRAM (Cont'd)

6.4.2 Eligibility Requirements

- A. The discounted service will be provided for one (1) residential telephone line per household, at the subscriber's principal place of residence.
- B. The applicant must certify that their annual household income is at or below 150% of the federal poverty guidelines participate in, be an eligible resident of Tribal lands, or have a person or child who resides in the customer household who participates in the programs identified in Chapter 47 of the Code of Federal Regulations § 54.409 and also P.U.C. Substantive Rule 26.412 regarding consumer qualification for Lifeline.
- C. Procedures for Establishing Lifeline Discounts
- (1) Consumers within the Company's service area identified as eligible for Lifeline Service by the Texas Low Income Discount Administrator through the automatic enrollment process under Commission Substantive Rule 26.412, shall be provided Lifeline Service discounts unless the Company receives a customer request to be excluded from such discounts. Consumers who are eligible for Lifeline Service but do not have telephone service at the time the LIDA provides its eligibility list to the Company are responsible for contacting the Company and initiating a request for service from the Company.

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LOCAL EXCHANGE SERVICE

6.4 LIFELINE PROGRAM (Cont'd)

6.4.2 Eligibility Requirements (Cont'd)

C. Procedures for Establishing Lifeline Discounts (Cont'd)

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- (2) Consumers who do not participate in one of the designated programs but who meet income qualifications by having an annual income at or below 150% of the federal poverty guidelines, may establish self-enrollment eligibility for Lifeline Service by contacting the LIDA and receive Lifeline Service discounts within 30 days of proof of eligibility.
- (3) The discontinuance of the Tel-Assistance program effective September 1, 2001 allows the Company to move Tel-Assistance customers to Lifeline Service. The Brazoria exchange local service Tel-Assistance rate is a greater benefit than Lifeline, therefore, customers will continue to receive the grandfathered Tel-Assistance rate. For remaining Tel-Assistance customers who would not receive a greater benefit under Tel-Assistance Service rates, customers will be grandfathered at Lifeline rates. Rates will apply until the customer's service is discontinued or the customer is determined ineligible under this Section.

PUBLIC UTILITY COMMISSION OF TEXAS  
APPROVED

MAY 10 '07 CONTROL# DKT. NO. 34169

TARIFF CLERK

ISSUED BY: John H. Greenberg  
President



LOCAL EXCHANGE SERVICE

6.4 LIFELINE PROGRAM (Cont'd)

6.4.2 Eligibility Requirements (Cont'd)

D. Provision of Service

- (1) The Company shall provide Lifeline Service to all eligible consumers identified by the LIDA within its service area if the consumer is a customer of the Company. Within 30 days after receipt of the list or receipt of customer affidavit, the Company shall begin reduced billing for those eligible low-income consumers.
- (2) If the eligible consumer changes the telephone service to qualifying services or initiates new qualifying service, the Company shall begin reduced billing at the time the change of service becomes effective or at the time the new service is established.
- (3) The Company will discontinue Lifeline Service discounts upon notice by LIDA that a customer is no longer eligible.
- (4) The Company has provided a confidentiality agreement to the LIDA specifying the use of confidential client information is solely for providing Lifeline Service.

6.4.3 Deposits

1. The deposit requirements will be waived for Lifeline Service applicants who voluntarily elect to subscribe to Toll Denial Service.

LOCAL EXCHANGE SERVICE

6.4 LIFELINE PROGRAM (Cont'd)

6.4.4 Lifeline Service Discounts

A. Eligible consumers who subscribe to Lifeline Service will receive the following discounts:

- (1) Federal Reduction. The Company shall grant qualifying low-income consumers support of \$9.25 per month or equal to the amount as directed by the Federal Communications Commission in Chapter 47 of the Code of Federal Regulations § 54.403 regarding Lifeline support.
- (2) State Reduction. The Company shall give qualifying low-income consumers a state-approved reduction of up to a maximum of \$3.50 in the monthly amount of intrastate charges due in addition to the Area Discount described below.
- (3) Area Discount. The Company shall give qualifying low-income consumers an area discount composed of up to 25% of any actual rate increase by the Company implemented after January 1, 2014. The discount shall be consistent with P.U.C. SUBST. R. 26.412 and the Small and Rural Incumbent Local Exchange Company Universal Service Plan (SRILEC USP). The area discount will apply to Lifeline providers operating in the Company's service area. The Lifeline Area Discount in the Brazoria Exchange is \$0.21 and the Lifeline Area Discount in the Churchill Exchange is \$0.53.
- (4) Combined Lifeline Discounts. The Company shall apply the above discounts, however, the combined discounts shall not result in a rate of less than zero charged for the customer's basic local service.

ISSUED BY: John H. Greenberg  
President

PUBLIC UTILITY COMMISSION OF TEXAS  
APPROVED / EFFECTIVE  
Dec. 1, 2014 TC. NO. 43699  
TARIFF CLERK

LOCAL EXCHANGE SERVICE

6.4 LIFELINE PROGRAM (Cont'd)

6.4.5 Service Charges

- A. Service charges do not apply when eligible customers with existing residential service convert to Lifeline Service.
- B. Service charges apply when:
- (1) At the time Lifeline Service billing is initiated, where existing eligible residential local exchange access service customers request additional features, such as special or custom calling features.
  - (2) A customer receiving Lifeline Service voluntarily elects to convert to telephone service arrangements, which preclude Lifeline Service eligibility.
  - (3) New residential applicants (those without existing local exchange access service) eligible for the Lifeline Program will be subject to applicable service charges.
- C. Any subsequent moves or changes after the initial connection to Lifeline Service will be subject to applicable service charges.

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LOCAL EXCHANGE SERVICE

6.4 LIFELINE PROGRAM (Cont'd)

6.4.6 Payments and Disconnection of Service

- A. The Company may not disconnect Lifeline Service for nonpayment of toll charges.
- B. A Lifeline customer is required to adhere to the same bill payment policies applicable to all of the Company's customers.

**Brazoria Telephone Company**

**Study Area Code 442040**

**Response to Line 3010 – Milestone Certification (47 CFR §54.313(f)(1)(i))**

Brazoria Telephone Company hereby certifies that throughout 2014, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream, and currently, it is taking reasonable steps to provide upon reasonable request actual speeds of at least 10 Mbps downstream/1 Mbps upstream broadband service at with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas and that requests for such service are met within a reasonable amount of time. If a request for broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream is unreasonable, and offering broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream is reasonable, the Company offers broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream.

**Brazoria Telephone Company (SAC 442040)**

**Response to Line 3012 - List of Community Anchor Institutions to Which the ETC Newly  
Began Providing Service**

The FCC's *USF/ICC Transformation Order* requires a listing of community anchor institutions to which the ETC newly began providing broadband service. Brazoria Telephone Company did not newly begin providing community anchor institutions with access to broadband service in calendar year 2014.

**REDACTED – FOR PUBLIC INSPECTION**

**ATTACHMENT - LINE 3017**

**ATTACHMENT REDACTED IN ENTIRETY**